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August 17, 2021

Via ECF

The Honorable Judge Analisa Torres
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **Chavaloc Choror et al v. Abitino's Pizza 49th Street Corp. et al**
1:19-cv-09297 (AT)

Dear Judge Torres:

This office represents the named Plaintiffs in the above-referenced matter, and we respectfully submit this letter in response to the Court's August 3, 2021 Order to Show Cause and to request a two-week extension of time for the parties to submit their settlement agreement and motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) ("Settlement Agreement"). We sincerely apologize to the Court for overlooking the prior deadlines, the result of an inadvertence, and for not filing this status report to the Court sooner.

On April 30, 2021, the Court initially ordered that the parties' Settlement Agreement documents in this matter were due to the Court by May 30, 2021 (ECF Dkt. No. 42); and on June 28, 2021, Your Honor extended the parties' deadline to July 6, 2021. (Id.)

Our office has been working closely with defense counsel on finalizing the drafting of the terms of the parties' Settlement Agreement and Motion for Court Approval. As the parties are still in the process of finalizing the necessary documents for the Court's review and obtaining their clients' signatures, the parties are not yet prepared to file a finalized Settlement Agreement and respectfully request a two (2) week extension to do so. If granted, the parties expect at this time to have the finalized Settlement Agreement documents on or before August 31, 2021. Our office will continue to work diligently with defense counsel over the next few days and anticipate August 31, 2021 to be enough time to do so.

Defendants' counsel has consented to this request for an extension.

This is the second request for an extension of time to file the settlement documents and this request will not affect any other scheduled dates or deadlines and we again offer our apologies

to the Court for failing to comply with the prior Orders and will make sure this does not happen again.

We thank Your Honor for her consideration on this matter and we remain available to provide any additional information.

Respectfully submitted,

/s/
Roman Avshalumov, Esq.

GRANTED. By **August 31, 2021**, Plaintiff shall file the parties' settlement agreement and related documents.

SO ORDERED.

Dated: August 19, 2021
New York, New York



ANALISA TORRES
United States District Judge